



**NSTAR**  
**ELECTRIC**

800 Boylston Street, Boston, Massachusetts 02199

**Via hand delivery**

June 1, 2006

Mary L. Cottrell, Secretary  
Department of Telecommunications and Energy  
One South Station, 2<sup>nd</sup> Floor  
Boston, MA 02110

RE: Double Pole Report, D.T.E. 03-87

Dear Ms. Cottrell:

On behalf of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric, I am submitting NSTAR Electric's company-specific double pole report to the Department of Telecommunications and Energy (the "Department"). This report responds to the June 16, 2005 Hearing Officer Procedural Ruling that established a standardized format for the filing of semi-annual reports, as required pursuant to Report to the Legislature on Double Poles, D.T.E. 03-87, at 15-16 (2003). The Hearing Officer's June 16<sup>th</sup> ruling set forth a six-month reporting schedule for NSTAR Electric, Fitchburg Gas and Electric Light Company, Massachusetts Electric Company, Nantucket Electric Company, Verizon Massachusetts and Western Massachusetts Electric Company (together, the "Pole Owners") to file statewide information on the status of backlog and new double poles,<sup>1</sup> as well as the submission of company-specific information regarding the progress of the individual Pole Owners in relation to their compliance plans.

• **Background**

On January 27, 2004, NSTAR Electric submitted its Plan ("2004 Plan") for eliminating the backlog of double utility poles to the Department pursuant to D.T.E. 03-87. In its 2004 Plan, the Company proposed to eliminate its existing backlog of double poles and to streamline the process of installation of new poles to ensure that double poles are removed in a timely manner in the future by:

1. Eliminating the current backlog of double pole sets within three years;
2. Managing the Pole Lifecycle Management ("PLM") system database with other utilities to ensure that accurate information regarding double pole sets is reflected and that pole tenants are notified when they are "next in line" for moving their facilities from the old pole to the new pole in a set;
3. Dedicating work crews to eliminate the backlog, based on prioritization;

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<sup>1</sup> The Pole Owners jointly filed with the Department of Telecommunications and Energy (the "Department") their second statewide report regarding double poles on May 5, 2006.

4. Prioritizing the elimination of double pole sets by first removing pole sets in communities with the highest volume of sets; and
5. Holding NSTAR Electric regional directors accountable for daily management of the PLM database and the elimination of the double pole backlog.

Consistent with the 2004 Plan, the Company has worked to eliminate the backlog of double-poles sets and to minimize new double-pole sets. Because of ongoing work between the Pole Owners and the continuing refinement of the PLM system, the process of notifying pole tenants of their responsibility to move their attachments is being initiated more quickly, which has resulted in the process having a steady reduction in the backlog. The Company is proactively managing the attachments of third parties to ensure the cooperation of all parties in the efficient removal of double-pole sets. To this end, NSTAR Electric, Verizon, Comcast and RCN meet regularly to discuss double poles and other issues within their respective service territories. Moreover, the Company has internal double pole reduction team meetings and NSTAR Electric, Verizon and the other Pole Owners conduct monthly task force meetings to review and assess ongoing tracking and removal efforts. NSTAR Electric has also maintained its use of crews for wide-scale removal of double poles within defined municipalities with higher concentrations of double-pole sets. These combined actions have resulted in the efficient reduction and management of double-pole sets within the NSTAR Electric service territory, both in the field and administratively.

**• Double Pole Plan in Capital Projects Scheduling List**

Consistent with the settlement approved in D.T.E. 05-85, the Company has made specific commitments with regard to expediting the removal of double poles in its service territory. Particularly, Section 2.25 of the Settlement Agreement required NSTAR Electric to file a specific list of projects, the Capital Projects Scheduling List ("CPSL"), designed to improve reliability and safety. The CPSL, filed on February 22, 2006, included a specific program plan for the inspection, replacement, restoration and transfer of double poles. The objectives of the Double-Pole Program are: (1) to enhance the safety and reliability of electric service to all customers served by the Company; and (2) to reduce the number and duration of double poles in the municipalities served by NSTAR Electric. This plan was based on current projections of work-force availability and the schedules for distribution and transmission system construction and maintenance projects. Subject to constraints imposed by third-party transfers, emerging system conditions, reliability requirements and work force availability, the Company's 2006 performance goals for the Double-Pole Program include:

- As a first priority, elimination of double-pole sets created prior to January 2004 (subject to the completion of transfers by responsible pole tenants);
- Completion of all priority distribution-pole replacements and restorations to mitigate new double-pole sets resulting from the inspection process;

- Elimination of up to 25 percent of double-pole sets created after January 2004 (subject to the completion of transfers by responsible pole tenants);<sup>2</sup>
- Modification of work practices to complete transfers and subsequent removals of double-pole sets created after January 1, 2006 as they arise to the extent practical; and
- Active communication with third-party attachees to motivate timely transfers of their equipment, as well as with local communities to solicit input that can be incorporated into the Company's work schedules. The Company continues to contact third parties with pole attachments that need to be transferred to indicate NSTAR Electric's intent to work through the pre- and post-2004 backlog and to request that they conduct their transfers in a timely fashion.

Moreover, beginning January 1, 2006, the Company's set an objective to complete all transfers of electric facilities contemporaneously with a new pole set when the pole is added as part of a planned project. However, additional time may be required between the pole set and the pole transfers under the following circumstances:

- In the event of major storms that require the diversion of resources;
- When a pole relocation is required in a location that differs from the original set; and
- When pole replacements are installed as part of a reconductoring project,, which scheduling may vary from month to month.

Thus, in accordance with the Department-approved settlement in D.T.E. 05-85, NSTAR Electric has agreed to aggressively monitor and remove double poles, through the implementation of its Double-Pole Program.

- **Joint Report**

On May 5, 2006, NSTAR Electric, with the other Pole Owners, submitted a Joint Report detailing the status of existing double-pole sets in the Commonwealth as of April 1, 2006. It is apparent from this Joint Report that the Pole Owners and third party attachers are making important strides in the management and removal of double-pole sets. However, because of continued growth in the distribution system, the addition of new infrastructure projects and the expanding nature of users seeking to attach their facilities to utility poles, the placement of new poles continues to increase. At the same time, complications in coordinating the transfer of facilities off of double poles among a multitude of attachers with differing rights and interests constrain the pace with which double-pole sets can be removed. NSTAR Electric and the Pole Owners are working collaboratively on an ongoing basis to address these issues.

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<sup>2</sup> Between February 1, 2004 and December 31, 2005, 9,459 poles were set in the NSTAR Electric service territories and of those 4,567 (i.e., 48 percent) have had all transfers completed and the poles removed.

- **Current Status for NSTAR Electric**

Attached to this NSTAR Electric-specific report is the summary data from the PLM system for Double Pole Activity for the time period November 1, 2005 through April 30, 2006 on an NSTAR Electric system-wide basis (see Attachment A, appended hereto). With regard to NSTAR Electric's ongoing program to eliminate the backlog of double-pole sets placed prior to January 2004, the Company has developed a strategy that will:

- Complete the remaining 881 transfers (see Table 1, below);
- Remove those double poles that have been identified as "ready for removal";
- Continue "chunking"<sup>3</sup> poles where appropriate; and
- Coordinate with the Pole Owners and other utilities to expedite the removal of the remaining 4,576 double poles.

The Company has made significant progress and has removed 10,419 (or 69 percent) of backlog double-pole sets within its service territory. Of the remaining 4,576 backlog double poles, the Company has already taken all ball-in-court actions to remove or transfer facilities for approximately 65 percent of those poles, and awaits the transfer of other attachers before further actions can be taken by NSTAR Electric. For this reason, continued coordination and collaboration with the other Pole Owners and utilities is essential to ensure additional progress in eliminating the backlog of double poles.

The NSTAR Electric-specific report also indicates that, since November 1, 2005, 2,671 double poles have been removed and 2,649 new double poles have been set in the NSTAR Electric service territory. Additionally, since November 1, 2005, NSTAR Electric has completed 3,375 wire transfers. The overall net result is that, even with the unprecedented rate of new installations, the Company has kept up with these installations and reduced the existing backlog. As of April 30, 2006, there were 11,130 double poles (both backlog and new) in NSTAR Electric's service territory.

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<sup>3</sup> "Chunking" involves the practice whereby NSTAR Electric removes virtually all of an existing old pole when the new replacement pole is placed and the electric facilities are transferred, leaving only an approximately 3-4 foot "stub" braced at the top of the new pole. When the last transfer is completed, the stub is removed, usually by the party making that transfer. This practice expedites the removal of large portions of the pole and generally eliminates the need for NSTAR Electric to return to a particular double-pole set to remove the old pole.

Letter re: Double Pole Report, D.T.E. 03-87

June 1, 2006

Page 5 of 6

NSTAR Electric is committed to working with the Department, Pole Owners and the various attachers to continue to make progress in the removal of double-pole sets. Thank you for your attention to this matter. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

A handwritten signature in black ink that reads "Kerry Britland (DBR)". The signature is written in a cursive style with a large, stylized "K" and "B".

Kerry Britland

cc: William Stevens, Hearing Officer  
Ronald LeComte, Electric Power Division

Enclosure

**Table 1**

**Double Poles & Transfers – NSTAR System Status  
Total Backlog Quantity as of April 30, 2006  
(Includes Verizon & NSTAR Poles in NSTAR Territory)  
(Source – Double Pole Database)**

<b>Action Required</b>	<b>Backlog Quantity April 30, 2006</b>
Original Quantity of Backlog Poles	14,996
Backlog Poles Completed	10,419 (69%)
Total Backlog Poles Still to Complete	4,576
NSTAR Backlog transfers to Complete	881
NSTAR Backlog Poles Ready for Removal	823



Wednesday, May 03, 2006  
11:16:40 AM

# Monthly Double Pole Status Summary Report

Month 4  
Year 2006

Note: Pole Count includes Verizon Poles, Rem - NSTAR Poles Only, Trans - NSTAR Only

	Backlog Status			Backlog Month Activity			Backlog YTD Activity			Current Status			Monthly Completed			YTD Completed		
	Pole Count	Trans BIC	Ready Rem	Trans Compl	Rem Compl	Trans Compl	Rem Compl	Trans Compl	Rem Compl	Pole Count	Trans BIC	Ready Rem	New Sets	Trans	Rem	New Sets	Trans	Rem
<b>Boston</b>																		
Mass Ave	456	128	101	7				29		973	243	162	45	55	2	169	160	2
Total Boston	456	128	101	7				29		973	243	162	45	55	2	169	160	2
<b>South</b>																		
New Bedford	163	17	58		16		17		16	699	124	123	15	18	26	174	246	26
Plymouth	534	100	70	29	4		71		4	978	283	156	38	67	8	210	196	8
Yarmouth	208	76	45	12	1		24		1	917	256	151	26	33	5	204	212	5
Total South	905	193	173	41	21		112		21	2594	663	430	79	118	39	588	654	39
<b>West</b>																		
Framingham	719	15	86	6	92		136		92	2110	118	196	50	140	170	451	873	170
Somerville	741	282	170	5	21		41		21	1449	484	282	49	84	32	170	265	32
Walpole	403	17	63	16	28		47		28	859	183	97	33	60	45	96	144	45
Waltham	1352	246	230	36	24		288		24	3145	927	342	23	124	43	352	771	43
Total West	3215	560	549	63	165		492		165	7563	1712	917	155	408	290	1069	2053	290
Grand Total	4576	881	823	111	186		633		186	11130	2618	1509	279	581	331	1826	2867	331

- 1 - Backlog Status Pole Count: polestatus <> Normal Pole; yr\_install < 2/1/2004
- 2 - Backlog Status Trans BIC: attowner = NSTAR or " "; yr\_install < 2/1/2004; polestatus = Double Pole; attstatus = Ball-In-Court; type = pri elec or sec elec or street light
- 3 - Backlog Status Ready Rem: polestatus = Remediation; remediationparty = "NSTAR"; completedate = current month; attstatus = Completed
- 4 - Backlog Month Activity Trans Compl = yr\_installed < 2/1/2004; attowner = "NSTAR"; completedate = current month; attstatus = Completed
- 5 - Backlog Month Activity Rem Compl = yr\_installed < 2/1/2004; remediationparty = "NSTAR"; remediationenddate = current month
- 6 - Backlog YTD Activity Trans Compl = yr\_installed < 2/1/2004; attowner = "NSTAR"; completedate = current year; attstatus = Completed
- 7 - Backlog YTD Activity Rem Compl = yr\_installed < 2/1/2004; remediationparty = "NSTAR"; remediationenddate = current year
- 8 - Current Status Pole Count: polestatus <> Normal Pole
- 9 - Current Status Trans BIC: polestatus = Double Pole; attstatus = Ball In Court; attowner = NSTAR or " "; type = primary electric or secondary electric or street light
- 10 - Current Status Ready Rem: remediationparty = NSTAR; polestatus = Remediation
- 11 - Monthly Completed New Sets: yr\_install = the current month
- 12 - Monthly Completed Trans: att\_owner = NSTAR; completedate = the current month
- 13 - Monthly Completed Rem: remediationparty = NSTAR; remediationenddate = the current month
- 14 - YTD Completed New Sets: yr\_install = the current year
- 15 - YTD Completed Trans: att\_owner = NSTAR; completedate = the current year
- 16 - YTD Completed Rem: remediationparty = NSTAR; remediationenddate = the current year